

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

IN RE: § CASE NO. 19-11177-tmd  
§  
DEBORAH KRISTINE HEXUM, §  
§  
DEBTOR(S). § CHAPTER 7 PROCEEDING

APPLICATION OF TRUSTEE TO EMPLOY REALTOR AND REQUEST FOR RELIEF (WITH  
21-DAY LANGUAGE)

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR  
INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS FROM THE  
DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED  
WITHOUT A HEARING BEING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD.**

NOW COMES RANDOLPH N. OSHEROW, Chapter 7 Trustee ("Trustee") of the  
bankruptcy estate of DEBORAH KRISTINE HEXUM, and files his Application to Employ Realtor  
on Sale Real Estate. The Trustee would show the Court the following:

1. On 9/2/19, a voluntary petition was filed initiating this case under Chapter 7 of the  
Bankruptcy Code. On 9/3/19, Randolph N. Osherow was appointed Chapter 7 Trustee of Debtor's  
bankruptcy estate and continues to act in that capacity.

2. The Trustee wishes to employ Eric Steinhoff of EXP Realty, of 4416 137 National Plaza Suite 300,  
National Harbor, MD 20745, as the authorized Realtor for the Trustee for the sale of the real property  
in this case, described as:

3676 Carriage Hill Drive, Frederick, MD 21704-7351

3. Trustee has selected Eric Steinhoff of EXP Realty, as the Trustee believes that he is  
qualified to represent the bankruptcy estate in this proceeding, and it is necessary for the Trustee to  
employ Eric Steinhoff of EXP Realty, for such professional services to sell the real property for the  
benefit of the estate.

4. To the best of the Trustee's knowledge, Eric Steinhoff of EXP Realty, has no connection with  
the Debtor, the creditors, or any other party in interest, their respective attorneys and accountants. A

A copy of the proposed Order attached as  
Exhibit "A".

Verified Statement of Realtor of No Interest Adverse to Estate of Debtor and Disclosure Statement signed by Eric Steinhoff of EXP Realty, are attached hereto.

5. Trustee proposes to pay Eric Steinhoff of EXP Realty, a 6% commission, plus \$395.00 on the sale of each property, payable at closing, which compensation is not the subject of any agreement to share funds "except as to standard real estate earnest money contracts", that wording of "except as to the sharing of commission with other Realtors as set out in the Texas Real Estate Commission promulgated Unimproved Property Contract.

6. No notice or hearing on this Application, need be given.

WHEREFORE, PREMISES CONSIDERED, Trustee prays that he be authorized to employ Eric Steinhoff of EXP Realty, as Realtor under a listing agreement and pay Eric Steinhoff of EXP Realty, a 6% commission plus \$395.00, on the sale of the two properties listed above, and that an Order be entered.

Respectfully submitted this 15<sup>th</sup> day of October, 2019.

/s/ Randolph N. Osherow  
RANDOLPH N. OSHEROW, Chapter 7 Trustee  
Texas State Bar No. 15335500  
342 West Woodlawn, Suite 100  
San Antonio, Texas 78212  
(210) 738-3001 - Telephone  
(210) 737-6312 - Telefax  
rosherow@hotmail.com

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

IN RE: § CASE NO. 19-11177-tmd  
§  
DEBORAH KRISTINE HEXUM, §  
§  
DEBTOR(S). § CHAPTER 7 PROCEEDING  
ORDER AUTHORIZING EMPLOYMENT OF REALTOR FOR TRUSTEE ON SALE  
OF REAL PROPERTY

On the day this Order was signed, came for consideration the Application of Trustee to  
Employ Realtor on Sale of all non-exempt Real Property in this case including but not limited to:

3676 Carriage Hill Drive, Frederick, MD 21704-7351,  
and Request for Relief. It appearing that such application is proper and should be granted, it is  
therefore

EXHIBIT "A"

ORDERED, ADJUDGED and DECREED that the employment of Eric Steinhoff of EXP Realty, of 4416 137 National Plaza Suite 300, National Harbor, MD 20745, as Realtor for the estate is hereby authorized and approved. It is further

ORDERED, ADJUDGED and DECREED that said Realtor shall disclose in said statement the amount and source of any retainer or any other payment received by said Realtor in connection with or in contemplation of this case. It is further

ORDERED, ADJUDGED and DECREED that the employment of Eric Steinhoff of EXP Realty, of 4416 137 National Plaza Suite 300, National Harbor, MD 20745, at 6% compensation plus \$395.00, will be authorized by this Court Order on the sale of all property sold by the realtor in this case.

###

RANDOLPH N. OSHEROW, Chapter 7 Trustee  
342 W. Woodlawn, Suite 100  
San Antonio, Texas 78212  
(210) 738-3001 - Telephone  
(210) 737-6312 - Telefax  
[rosherow@hotmail.com](mailto:rosherow@hotmail.com)

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION


IN RE: § CASE NO. 19-11177-tmd  
§  
DEBORAH KRISTINE HEXUM, §  
§  
DEBTOR(S). § CHAPTER 7 PROCEEDING

DISCLOSURE OF COMPENSATION  
UNDER 11 U.S.C. 329 AND BANKRUPTCY RULE 2016(b)

I certify that Eric Steinhoff of EXP Realty, is the applicant for the position of Realtor for the Chapter 7 Trustee, Randolph N. Osherow, in the above-styled and referenced cause. No compensation has been paid to me in connection with the above-referenced case under Title 11 of the United States Code. Application is made herein for a commission of 6%, plus \$395.00, on the real property sales. The source of the compensation agreed to be paid is from the proceeds of the prospective sale of real property of the bankruptcy estate payable upon further order of this Court.

Eric Steinhoff of EXP Realty, presently has not agreed to share this compensation with any other person or entity BUT this property will be placed for sale in the Multiple Listing services of Board of Realtors; therefore, the rules of each service dictate that Eric Steinhoff of EXP Realty, co-op with other Realtors who are members of such services by sharing of the total commission (co-realtor to receive 2.500%) applicable to be received by Eric Steinhoff of EXP Realty, if one of those realtors should procure a Buyer, submit an offer and such offer is accepted by the Court for the property.

Dated this 30<sup>th</sup> day of September, 2019.

Signed by:   
Eric Steinhoff  
EXP Realty  
137 National Plaza  
Suite 300  
National Harbor, MD 20745

Realtor

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

IN RE:

DEBORAH KRISTINE HEXUM,

DEBTOR(S).

§  
§  
§  
§  
§

CASE NO. 19-11177-tmd

CHAPTER 7 PROCEEDING

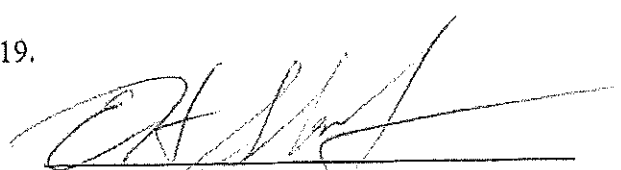
VERIFIED STATEMENT OF REALTOR  
OF NO INTEREST ADVERSE TO ESTATE OF DEBTOR

I, Eric Steinhoff, hereby state that Eric Steinhoff of EXP Realty, has no connection with the Debtor, creditors, or any other party in interest, their respective attorneys and accountants, other than I was the listing agent prior to Debtor filing for bankruptcy and Eric Steinhoff of EXP Realty, does not hold or represent any interest adverse to the bankruptcy estate, and is a disinterested entity within the meaning of 11 U.S.C. § 327(a) of the Bankruptcy Code.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

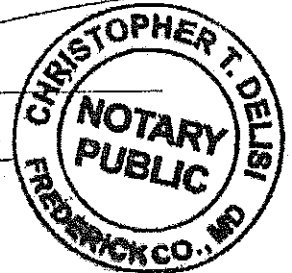
SIGNED this 30<sup>th</sup> day of September, 2019.

Signed by:

  
Eric Steinhoff  
EXP Realty  
137 National Plaza  
Suite 300  
National Harbor, MD 20745  
Realtor

SWORN TO AND SUBSCRIBED before, by the undersigned  
by Eric Steinhoff of EXP Realty, who states that the above is true and correct, to the best of his  
knowledge on this 30 day of September, 2019.

NOTARY PUBLIC,  
COUNTY OF Frederick  
STATE OF Maryland



My Comm. Exp 10-16-21

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

IN RE: § CASE NO. 19-11177-tmd  
§  
DEBORAH KRISTINE HEXUM, §  
§  
DEBTOR(S). § CHAPTER 7 PROCEEDING

CERTIFICATE OF MAILING

I certify that copies of the APPLICATION OF TRUSTEE TO EMPLOY REALTOR were mailed to the below named persons, by first class mail, on this the 1st day of September, 2019:

Deborah Kristine Hexum  
109 Cipressi Cove  
Georgetown, TX 78628

Susan G. Taylor *Oshero*  
Law Office of Susan G. Taylor  
1502 West Avenue  
Austin, TX 78701  
Counsel for Debtor

Debtor(s)

Eric Steinhoff  
EXP Realty  
137 National Plaza  
Suite 300  
National Harbor, MD 20745  
Realtor

U.S. Trustee  
903 San Jacinto Boulevard  
Suite 230  
Austin, TX 78701

SEE ATTACHED MATRIX FOR A LIST OF PARTIES SERVED WITH NOTICE.

/s/ Randolph N. Osherow  
RANDOLPH N. OSHEROW, Chapter 7 Trustee  
342 West Woodlawn, Suite 300  
San Antonio, Texas 78212  
(210) 738-3001 - Telephone  
(210) 737-6312 - Telefax  
rosherow@hotmail.com

(c)OFFICE OF GENERAL COUNSEL  
801 CHERRY ST UNIT 45  
FORT WORTH TX 76102-6882

(p)DISCOVER FINANCIAL SERVICES LLC  
PO BOX 3025  
NEW ALBANY OH 43054-3025

(p)INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

Affirm Inc  
PO Box 720  
San Francisco, CA 94104-0720

Army Airforce Exchange (AAFES)  
Creditor s Bankruptcy Service  
PO Box 740933  
Dallas, TX 75374-0933

Cornerstone Home Lending  
PO Box 77404  
Ewing, NJ 08628-6404

Cornerstone Home Lending, Inc.  
c/o Codilis & Moody, P.C.  
400 N. Sam Houston Pkwy E, Suite 900A  
Houston, TX 77060-3548

Department of Education  
Office of General Counsel  
400 Maryland Ave, SW Rm 6E353  
Washington, DC 20202-0001

Department of Housing  
& Urban Development (HUD, FHA)  
U.S Dept of HUD  
451 7th., SW Room 10258  
Washington, DC 20410-0001

Jared & Erica Plummer  
3676 Carriage Hill  
Frederick, MD 21704-7351

Kohls/Capital One  
N56 W 17000 Ridgewood Dr  
Menomonone Falls, WI 53051-5660

New Hampshire Higher Ed/Granite State Ma  
Attn: Bankruptcy  
PO Box 2097  
Concord, NH 03302-2097

Office of Litigation  
US Department of HUD  
451 7th St., SW, Room 10258  
Washington, DC 20410-0001

PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

Small Business Administration (SBA)  
U.S. Small Business Administration  
Little Rock Commercial Loan Servicing  
Center 2120 Riverfront Drive, Suite 100  
Little Rock, AR 72202-1794

Specialized Loan Servicing/SLS  
Attn: Bankruptcy Dept  
8742 Lucent Blvd #300  
Highlands Ranch, CO 80129-2386

Synchrony Bank/Amazon  
Attn: Bankruptcy  
PO Box 965060  
Orlando, FL 32896-5060

Synchrony Bank/Lowes  
Attn: Bankruptcy  
PO Box 965060  
Orlando, FL 32896-5060

Tower Federal Credit Union  
Attn: Bankruptcy  
PO Box 123  
Annapolis Junction, MD 20701-0123

United States Attorney General  
Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, DC 20530-0009

United States Department of Justice  
United States Attorney, Civil Process Cl  
601 N. W. Loop 410, Suite 600  
San Antonio, TX 78216-5597

USAA Federal Savings Bank  
Attn: Bankruptcy  
10750 Mcdermott Freeway  
San Antonio, TX 78288-1600

VA Regional Office  
Office of District Counsel  
1400 N. Valley Mills Dr.  
Waco, TX 76710-4432

Veterans Administration (VA)  
VA Regional Office  
Office of District Counsel  
2515 Murworth Drive  
Houston, TX 77054-1603

Williamson County  
c/o Tara LeDay  
P.O. Box 1269  
Round Rock, TX 78680-1269